1 2 3 4 5 6 7 8 9 10 11	QUINN EMANUEL URQUHART & SULLIVA Sean Pak (Bar No. 219032) seanpak@quinnemanuel.com Melissa Baily (Bar No. 237649) melissabaily@quinnemanuel.com James Judah (Bar No. 257112) jamesjudah@quinnemanuel.com Lindsay Cooper (Bar No. 287125) lindsaycooper@quinnemanuel.com Iman Lordgooei (Bar No. 251320) imanlordgooei@quinnemanuel.com 50 California Street, 22nd Floor San Francisco, California 94111-4788 Telephone: (415) 875-6600 Facsimile: (415) 875-6700 Marc Kaplan (pro hac vice) marckaplan@quinnemanuel.com 191 N. Wacker Drive, Ste 2700 Chicago, Illinois 60606 Telephone: (312) 705-7400 Facsimile: (312) 705-7401 Attorneys for GOOGLE LLC	AN, LLP		
13	UNITED STATES DISTRICT COURT			
14	NORTHERN DISTRICT OF CALIFORNIA			
15	SAN FRANCISCO DIVISION			
16				
17	SONOS, INC.,	CASE NO. 3:20-cv-06754-WHA Related to CASE NO. 3:21-cv-07559-WHA		
18	Plaintiff,	DECLARATION OF ANNE-RAPHAELLE		
19	vs.	AUBRY IN SUPPORT OF GOOGLE LLC'S ADMINISTRATIVE MOTION TO		
20	GOOGLE LLC,	SEAL PORTIONS OF ITS MOTION FOR SUMMARY JUDGMENT SLIDES		
21	Defendant.			
22		J		
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		CASE NO. 2.20 ov 06754 WH		

DECLARATION OF ANNE-RAPHAELLE AUBRY

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27 28 I, Anne-Raphaelle Aubry, declare and state as follows:

- I am an attorney licensed to practice in the State of Massachusetts and am admitted to practice pro hac vice before this Court. I am an associate at Quinn Emanuel Urquhart & Sullivan LLP representing Google LLC ("Google") in this matter. I have personal knowledge of the matters set forth in this Declaration, and if called as a witness I would testify competently to those matters.
- 2. I make this declaration in support of Google's Administrative Motion to File Under Seal Portions of Its Notice of Lodging Presentation Slides Re The March 30, 2023 Summary Judgment Hearing ("Notice"). If called as a witness, I could and would testify competently to the information contained herein.
 - 3. Google seeks an order sealing the materials as listed below:

Document	Portions to be Filed Under	Designating Party
	Seal	
Attachment A to Google's Notice ("Attachment A")	Portions outlined in yellow boxes	Google
Attachment A	Portions outlined in green boxes	Google and Sonos

4. The portions of Attachment A outlined in yellow boxes contain references to Google's confidential business information and trade secrets, including details regarding source code, architecture, and technical operation of Google's products and functionalities that Sonos accuses of infringement. The specifics of how these functionalities operate is confidential information that Google does not share publicly. Thus, public disclosure of such information could lead to competitive harm to Google as competitors could use these details regarding the architecture and functionality of Google's products to gain a competitive advantage in the marketplace with respect to their competing products. Google has therefore designated this information as HIGHLY CONFIDENTIAL-ATTORNEYS' EYES ONLY and/ or HIGHLY CONFIDENTIAL/ATTORNEYS' EYES ONLY— SOURCE CODE under the protective order (Dkts. 92, 94), I also understand that a less restrictive alternative than sealing portions of the Notice would not be sufficient because the information sought to be sealed is Google's confidential business information and trade secrets but is necessary to Google's Motion for Summary Judgment.

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5. The portions of Attachment A outlined in green contain regarding confidential business agreements that are not public, as well as details regarding the future business and commercial plans of partnerships. I understand that public disclosure of this information would harm Google's competitive standing and its ability to negotiate future agreements by giving competitors access to Google's highly confidential business thinking and asymmetrical information about Google's collaboration strategies to other entities. If such information were made public, I understand that Google's competitive standing would be significantly harmed. Google has therefore designated this information as HIGHLY CONFIDENTIAL—ATTORNEYS' EYES ONLY under the protective order Dkts. 92, 94). I understand that a less restrictive alternative than sealing portions of the Notice would not be sufficient because the information sought to be sealed is Google's confidential business nformation but is necessary to Google's opposition to Sonos's Motion for Summary Judgment. I also understand that this Court has previously granted sealing of the same and/or similar information. See, e.g., Dkts. 39 at 1; 334 at 3.

I declare under penalty of perjury under the laws of the United States of America that to the best of my knowledge the foregoing is true and correct. Executed on April 28, 2023, in Boston, Massachusetts.

DATED: April 28, 2023

By: /s/ Anne-Raphaelle Aubry Anne-Raphaelle Aubry

ATTESTATION I, Sean Pak, am the ECF user whose ID and password are being used to file the above Declaration. In compliance with Civil L.R. 5-1, I hereby attest that Anne-Raphaelle Aubry has concurred in the aforementioned filing. DATED: April 28, 2023 /s/ Sean Pak Sean Pak